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8 UNITED STATES DISTRICT COURT
9 FOR THE CENTRAL DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA

11 Plaintiff,

12 v.

13 PETER LEE,

14 Defendant.

15) No. CR 97- 1181

16) I N F O R M A T I O N

17) [18 U.S.C. § 793(d): Attempt to
18) Communicate National Defense
19) Information to A Person Not
20) Entitled To Receive It; 18
21) U.S.C. § 1001: False Statement
22) to Government Agency]

23 The United States Attorney Charges:

24 COUNT ONE

25 [18 U.S.C. § 793(d)]

26 On or about January 8, 1985, in the People's Republic of
27 China, defendant PETER LEE, now a resident of Los Angeles County,
28 within the Central District of California, having lawful
possession of information relating to the national defense of the
United States, did willfully attempt to communicate said
information to a person not entitled to receive it, namely an

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1 agent of the People's Republic of China, with reason to believe
2 that said information could be used to the advantage of the
3 People's Republic of China.

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3 COUNT TWO

4 [18 U.S.C. § 1001]

5 On or about May 27, 1997, in Los Angeles County, within the
6 Central District of California, defendant PETER LEE knowingly and
7 willfully made false, fictitious, and fraudulent statements and
8 representations as to material facts within the jurisdiction of
9 the United States Department of Defense; specifically, defendant
10 PETER LEE knowingly submitted a Post-Travel Questionnaire with
11 the security officer of his employer, TRW, Inc., in which
12 defendant PETER LEE falsely stated that while visiting the
13 People's Republic of China from on or about April 30, 1997, to on
14 or about May 22, 1997, he was not approached by foreign nationals
15 and asked questions about technical information. In truth and
16 fact, as defendant PETER LEE well knew, he had been repeatedly
17 approached by foreign nationals seeking technical information
18 during his visit to the People's Republic of China.

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21 NORA M. MANELLA
22 United States Attorney

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24 DAVID C. SCHEPER
25 Assistant United States Attorney
26 Chief, Criminal Division

27
28 JEFFREY C. EGLASH
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